

US EPA ARCHIVE DOCUMENT



August 28, 2000

Title VI Guidance Comments
US Environmental Protection Agency
Office of Civil Rights (1201A)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Also sent to e-mail: civilrights@epa.gov

Dear Madam or Sir:

Re: Request for Comments on: *Draft Title VI Guidance for EPA Assistance Recipients Administering Environmental Permitting Programs (Draft Recipient Guidance) and Draft Revised Guidance for Investigating Title VI Administrative Complaints Challenging Permits (Draft Revised Investigation Guidance).*

The Greater Cincinnati Chamber of Commerce has over 6500 business members in the Ohio, Kentucky, and Indiana tristate area. USEPA's draft Title VI Guidance includes many issues important to Chamber businesses.

The Chamber's Air Quality Committee has reviewed the Title VI Guidance. The Committee has developed the following comments. In addition, these comments were reviewed by the Hispanic Chamber of Commerce of Greater Cincinnati. The officials of that Chamber concur with the views expressed herein.

We trust you will give our comments thorough consideration, and work to resolve our concerns, before finalizing the Guidance.

The spirit of the proposed Guidance is commendable but our Committee concludes that the implementation of the Guidance will be difficult, always open to challenge, and potentially accusatory.

Summary of Comments:

- Permits and the Permitting Process: Despite EPA's claim that the Guidance will not impact individual operating permits, or – just as critically -- the permitting process, we conclude the opposite: The Guidance will in fact open new and emotionally charged avenues for challenging and delaying permit applications and permit changes.

- Population Survey Difficulties: The Guidance presents, and then builds upon a notion that “disparately affected” subgroups can be identified and compared. In reality, the science and art of epidemiology and public health cannot provide the definitive answers implied by a Title VI review.
- Brownfields and Urban Development: EPA claims that the Guidance will not thwart brownfield redevelopment and efforts by cities like Cincinnati to retain and expand manufacturing and industrial bases. But that claim is not documented in the Guidance. We conclude the opposite: We think that if a business has to face *new* hurdles regarding permit applications then business managers will readily choose to relocate or expand in localities far from cities such as Cincinnati. More likely, new activity will move to another county, another state, or another country.

Detailed Comments on Specific Sections of the Proposed Guidance:

Part C, Section V. “Investigative Procedures”

To acquire or revise an environmental permit, regulated facilities direct significant resources to ensure compliance with applicable laws, rules, and regulations. All available tools are used to accomplish this goal, including modeling, emissions testing, research and development, predictive exercises, testing, material balance and other calculations.

A common thread links the permitting process. The applicant wants to document that a facility’s operations, when compared against a standard, or benchmark, will comply with that standard. Predicted compliance allows the project to proceed, with relative assurance it will finally be judged acceptable.

This established practice serves to illustrate a basic flaw with EPA’s draft Guidance. The Guidance does not present a methodology for a permit holder, or permit applicant, to determine whether a project will result in “disparate impacts” *that actually violate Title VI*. Without such a methodology, a permit applicant cannot know whether a project should continue, whether it is a viable project, or if it should be abandoned.

Public regulatory agencies (the “recipients” under the draft Guidance) also direct significant resources to review permit applications in order to *ensure environmental compliance*. These public agencies will face the same challenges: an inability to predict which facility impacts might violate Title VI.

In our opinion, the Guidance creates a new social-activist role for state environmental agencies, which we do not support. Environmental regulators need to ensure that environmental statutes are implemented and that facility permits have appropriate limits and controls for public health and safety. EPA’s draft investigative approach does not account for relevant social, economic, historical and development issues impacting an area or group. The Guidance does not clearly recognize and emphasize that an environmental operating permit can be but one minor player within a geographic area and the people living nearby.

Furthermore, the policy relegates the role of the permittee to that of a lonely right fielder. Consider Section V.B.1:

“In response to allegations, or during the course of an investigation, *recipients* as well as *complainants* may submit evidence such as data and analysis to support their position that an adverse disparate impact does or does not exist” (emphasis added).

However, In EPA’s response-to-comments, at page 39693, the Guidance states:

“The permittee may also be asked to provide information to assist in the investigation of the complaint. The recipient may wish to notify the permittee about the investigation, if potential mitigation measures involve the permittee.”

That allowance is after-the-fact. It’s unfair that the Guidance does not require equal participation among recipient, complainant, and permittee. The Guidance should require notice to the permittee, who, after all, may be responsible for “mitigation measures.”

The resources of USEPA’s Office of Civil Rights should be directed at state permitting programs in order to identify and correct institutional problems with these programs that result in patterns of environmental injustice. In reaching any conclusions on the validity of a complaint, the scope of the impact should be limited to those that are actually within the legal authority of the recipient. Due recognition and consideration should be given to causes other than environmental permitting, such as the historical location of industry and workforces. The focus on individual permits is flawed both as reactive and as piecemeal.

While EPA writes that the Title VI investigative procedures are not intended to be reflective of a judicial process, the Guidance still presents an amorphous investigatory process with no clear guidelines. We would not recommend a process analogous to a judicial one. However, we still seek a clearer document regarding the parameters and appropriate factors in a Title VI investigation.

Part C, Section V.B.2 “Area-specific Agreements”

The Area-specific Agreement is built upon vague concepts, incompletely developed and defined.

For example, EPA does not define “Area”, nor does it tell recipients how to identify Areas. Apparently, an Area could include a 20 foot radius, or expand to include a neighborhood, a metropolitan region, a state, or entire parts of the US (in the case of a utility plant, for example).

The Guidance does not address potential conflicts along Area boundaries. For example, consider if one locale agrees to be included, or chooses inclusion, within an Area-specific Agreement. Across the street, however, a separate locality may not want to be part of the Agreement. After a Title VI review, a recipient could propose changes to

its permitting program. However, the Guidance raises the possibility that a recipient could undertake different policies in an Area-specific Agreement compared to policies undertaken beyond the Area. The Guidance needs to detail how the recipient's approach to permitting, enforcement, emission limits, public involvement, inspections, and related issues might differ between an Agreement locality vis-à-vis the non-Agreement locality.

The Guidance needs to detail and emphasize that if public or private facilities join an Agreement, or choose not to, either decision in no way shifts or changes the legal standing of those facilities, nor the terms and conditions of any environmental permits or obligations or program.

The Guidance is naïve to imply that joining an Area-wide Agreement would be anything but a difficult decision for a regulated facility. For example, the Guidance does not address liabilities, and related charges that could be developed by trial attorneys who galvanize class action defendants. The Guidance does not address enforcement, and fallback plans, and possible reassessments, if participants change or drop out. One wonders whether "joint and several liability" could apply to participants.

More fundamentally, though, the Agreement idea is built on two concepts of particular concern for an urban chamber of commerce.

First concern:

At the start of the "Area-specific Agreement" text in part C, EPA refers the reader to related text in part B, the part of the Guidance for recipients. Tellingly, the first example within that part B text is an example of how and where an Agreement might apply. EPA makes first reference to "a *section of a city* as an area where permitted emissions are contributing to discriminatory health effects on African Americans" (emphasis added).

Note the reference to *city*. As written, we think the Guidance leaves cities vulnerable, especially older manufacturing cities with mixed residential and manufacturing and transportation zones that have been active for more than a century.

At the Greater Cincinnati Chamber of Commerce, one strategic goal is to strengthen and maintain Cincinnati's critical manufacturing and industrial economy. That goal becomes more difficult to reach because of the lure of easy-to-develop greenfield sites that companies can so readily find. At those sites, companies face few concerns about confrontations with *city* sectors.

A Title VI review, and the notion of establishing Area-specific Agreements, is implicitly challenging for cities since suburban and exurban areas are far less diverse regarding population and density and history.

Therefore, depending on location in a region, a Title VI review unfairly carries different meanings and different consequences. Ironically, the Guidance is inequitable.

Second Concern:

In the *city* reference above, EPA's example refers to "discriminatory health effects on African Americans." In other parts of the Guidance, EPA refers to similar burdens for Asian-Americans and Hispanics.

The Guidance contains a lengthy "Adverse Disparate Impact Analysis" in which a protocol is proposed for elucidating ambient exposures and supposed health effects. As proposed, this is an investigative effort that could go on forever. Even if the Guidance were followed to the letter, epidemiologists and public health specialists cannot identify and separate every risk and toxic burden and environmental "stressors" and then assume qualities about those risks, that they are constant or stationary, for example.

Even more far reaching is the Guidance's implication that ambient environmental impacts can be singularly parsed among a population, leading to claims that African-Americans are affected one way, and Hispanic-Americans are affected a second way and Asian-Americans are affected another way while some -Americans are not affected at all.

EPA misleads the general public by implying (1) an ability to identify "discriminatory health impacts", and (2) that such "impacts" can be fairly and satisfactorily redressed via environmental operating permits. There is weakness in both of these assumptions. Consequently, subsequent policy changes will not be built on sound science, but on charges and counter-charges that are always open to debate.

Part C, Section VI.B.1 "Assess Applicability"

In Section I.E, "Principles for Implementing Title VI at EPA", EPA writes that one foundation for the Title VI complaint investigation process will be assessing the potential adverse disparate cumulative impacts from environmental stressors.

However, the investigative framework outlined in Section VI.B.1 of the Guidance, "Assessing the Applicability of Title VI Allegations", does not build on this foundation. Rather, the investigative procedures focus on individual permitting activity in a community, not on the health impacts that its citizens are experiencing.

We suggest it would be more consistent with Title VI principles if an investigation first quantified the cumulative levels of the environmental stressor in question. Next, determine if adverse health impacts could occur based on established exposure standards. Then, if safe exposure levels are exceeded, the investigation should shift, including an assessment of the Recipient's permitting program. If safe exposure standards are not being exceeded, the investigation should end.

The above changes would directly address community health concerns. However, they would impact a recipient's permitting programs only if true environmental risks exist.

For urban facilities, this section of the Guidance poses serious challenges. It will be extremely difficult to stay competitive in a regulatory environment where every process modification, plant expansion, or permit revision is ripe for a Title VI challenge. Facilities need to make operational changes that are often covered by environmental

permits. It's our opinion that the proposed Title VI investigation procedure yields redundant oversight, further encumbering business operations.

The Guidance raises the possibility that permit compliance would no longer preserve a facility's right to operate in the face of a Title VI allegation. A facility would be forced to conduct business under the constant threat that additional emission control measures could be required in response to a Title VI complaint.

When approached with such uncertainty, business managers will be prone to curtail operations in urban areas and invest in locations where environmental justice issues are less likely. The end result is that urban communities will suffer a loss of jobs, a decreased tax base, and a poorer economy, outcomes that the original Title VI legislation was designed to prevent.

We make the following suggestions, for instances in which a disparate cumulative impact from environmental stressors has been identified:

- OCR should focus investigations on needed improvements to Recipient's permitting and emission management programs, *not* on individual permits.
- If OCR maintains a need to focus upon individual permits, it should significantly limit the types of permit actions that can support a Title VI investigation. Investigations of individual permit actions should be pursued in cases where there is a significant increase in emissions of concern.
- As stated in the Guidance, minor permit modifications should be excluded as well as permits with significant emissions decreases.
- We disagree with the Guidance directive which subjects sites to environmental justice investigations (and risk their continued ability to operate) based on routine permit renewal activities. Permit renewals that maintain or decrease the current level of permitted emissions should NOT trigger environmental justice investigations.
- Minor modifications that do not significantly increase permitted emissions of a pollutant of concern should be excluded.
- Where area wide emission reductions are needed to address disparate cumulative impacts from identified stressors, area emission management programs should be established as part of SIPs to reduce these emissions.

Part C, Section VI.B.3 "Impact Assessment"

In this section, the Guidance challenges an investigation team to assess the following:

That a particular "permitted entity at issue, either alone or in combination with other relevant sources, may result in an adverse impact."

The U.S. EPA has been performing monitoring, modeling, and related risk and toxicity studies for over 30 years.

Where specific effects and adverse impacts have been noted (and notable), these observations have usually occurred in remote areas, focused on large singular facilities, with emissions not mixed with other sources, pathways, environmental stresses, or geographical setting.

The Guidance implies that similar impact assessments can be made in a far different environment: urban metropolitan regions with multiple sources, large populations, and vast transportation networks. This implication is misleading. We contend that the Guidance methodologies will not yield the answers that describe a cause and effect relationship. Rather, those answers will be “best estimates” but not best science. This weakness in the Guidance needs to be corrected.

In addition, we offer the following specific comments:

1. The proposed impact analysis includes the determination of risk. However, it does not define *acceptable risk*, nor a standard methodology to assess risk. The Guidance implies that no level of risk is acceptable, only a reduction in risk. Without a more complete presentation on risk, it is impossible to answer the question: how much risk reduction would be acceptable? Before the Guidance is finalized we urge development of a uniform risk assessment methodology, and a presentation on acceptable level of risk, in order to make the Guidance more equitable.
2. The Guidance proposes that an agency’s permit action signals when a complaint can be filed. The permitted facility would be investigated for its possible impact on an affected group. This process singles out one facility, despite possible contributions from many sources, either private or public facilities or area sources or transportation impacts.
3. The complaint can allege the effects of a single pollutant (stressor) or include the cumulative effects of multiple pollutants. The Guidance here is vague and this opens the procedure to possible abuse, possibly becoming a witch-hunt. We suggest that in order to reduce the time and cost of an investigation, the scope of a complaint should be specific to a single pollutant or group of pollutants.
4. The Guidance process is unfair to the permit holder. It adds another layer of uncertainty to the permitting process. The permit holder may be investigated and required to make additional emission reductions at some point after the permit has been issued. A *de minimus* or acceptable emission level should be set for all pollutants. In this manner, the permit holder could include an evaluation of off site pollutant impacts in order to minimize the possibility of a civil rights complaint.

In one sense the Guidance gives the investigation team a basic set of quantitative tools to determine adverse impact. However, the Guidance is cautionary regarding public health assessment. The Guidance notes that it takes years of exposure, on large groups of people, to detect and possibly measure adverse health effects. This means that some of

the “approaches” recommended in the Guidance just infer risk and health effects based on monitoring or modeling. The Guidance needs to describe how an investigation team should proceed if health effects are not really “measured” health effects, but just based on models. We also seek an enhanced presentation in the Guidance regarding uncertainties in data types, and how those uncertainties will be factored into the investigation team’s final discernment of disparate adverse impact.

Part C, Section VI.B.5 “Characterize Populations and Conduct Comparisons”

In this section, the Guidance proposes several methods to identify “affected populations.” Unfortunately, the guidance does not rank those methods.

We believe the methodologies in the Guidance are imprecise and theoretical, relying on “proximity” and mathematical models. Nowhere does the Guidance describe the benefits of one method over another.

Furthermore, it appears that any method would be acceptable as long as it identifies an affected population. A reviewer does not know how EPA will determine the reliability of one study method over another. In addition, the Guidance fails to address *actual* effects, only the *potential* to effect. This leaves the door open for extreme interpretations.

The next element is to determine the race, color, or national origin of the affected population. The guidance does not explain the reason for this determination. If *proximity* is the primary factor regarding an environmental exposure, then how are race, color, or national origin relevant ?

Further in this section, the guidance proposes to compare:

“The demographic characteristics of an affected population to demographic characteristics of a non-affected population or general population.”

What if the affected and non-affected populations are neighbors, each equally proximate to a permitted source?

The draft proposes to use census data. Our concern is that census data could be ten years old when it is used. To assure accuracy, we think the guidance should describe how EPA plans to address demographic changes.

The authors of the Clean Air Act believed that national primary pollutant standards minimized and controlled the impact of local emissions. This approach recognized that economic benefits outweighed limited adverse impacts. Thus, acceptable pollution levels were established, levels that were not to be exceeded.

Critically, though, nowhere in the Act did Congress write that there would not be an impact. We read the Guidance to propose that if a facility could impact an area, and thus a population, then it cannot have a permit, even if it does *not* have an impact. Thus, the *potential to impact* becomes the deciding factor.

The second major element is to compare the affected population to an appropriate comparison population to determine whether disparity exists that may violate EPA’s Title VI regulations. The Guidance methodology is not statistically relevant. The phrases used

indicate that the comparison population would “usually” be larger than the affected population. Thus the door is left open to choose a smaller population. That choice could bend an analysis toward a preconceived objective. The Guidance needs to utilize statistically accurate population comparison methodologies. No two different populations can be statistically identical

There is tremendous normal variability of population mix from area to area within a city and throughout the country. Without more meaningful assessment methodologies, the population mix screening criteria outlined in EPA’s Guidance is meaningless - it does not exclude anything. The questions then are how much and which types of differences are statistically significant between two areas in a city or two regions in a country.

Beyond the issue described above, the entire process does not take into account the practical needs of society. Certain industries and services will be located near or next to specific geographic features. Public officials make these siting decisions within zoning and other land use debates. These decisions may result in an impact on the value of adjacent property, such that the economic value declines. This decline could make the property more attractive to buyers who cannot afford other property. The result is that a demographic characteristic is created by the source itself because of the economic impact on the surrounding area. Because of geography, other economically equivalent areas may not be locally available for this population. Does this constitute unintended discrimination?

As written, the guidance implies that any source could be determined to present a potential impact on an affected population. The monetary cost to argue this determination will only benefit the legal profession and further burden the court system with litigation that is not beneficial to society. On its surface, this Guidance appears to serve a noble cause. In practice, though, we believe it misdirected, diverting the attention of society and resources from the root causes of injustice and, at the same time, increasing the pace of urban sprawl.

A more serious outcome might be the use of the Guidance to prevent any permitting of sources. For example, suppose a source wishes to move to a rural, greenfield area. Residents can allege social injustice. After all, they are currently not exposed to any emissions. By contrast, their environmental impact model shows that the proposed source would indeed impact them. By comparison, a similar population exists in adjacent counties. They are also not currently affected and will not be affected by the proposed source. The affected population and the comparison population are of the same race, color and national origin. Thus the potentially affected population and a comparison population are available and show a disparity.

Part D. Summary of Key Stakeholder Issues Concerning EPA Title VI Guidance: Follow-up Comments.

In Part D, EPA responds to comments regarding the 1998 Interim Guidance for Title VI review.

We think further debate would be productive on at least two topics within Part D. Those topics are under the headings “Consistency With State Permitting Procedures” and “Brownfields and Clean-Ups.” Our first comments pertain to “Consistency.”

In EPA’s *Response* in the “Consistency” section, the Agency notes that a recipient may grant an operating permit, but local officials have closer authority on where a facility is located, or zoned. EPA writes further that recipients,

“to comply with Title VI...are responsible for ensuring that the activities authorized by their environmental permits do not have discriminatory effects, regardless of whether the recipient selects the site or location of permitted sources.”

Actually, it seems unlikely that a state environmental agency would select a site for a permitted facility. Usually, public and private developers choose sites, and then analyze those sites for environmental suitability.

This brings up an added concern. It is very likely that a site for a permitted facility is planned and chosen with full participation among public and private and neighborhood representatives. In fact, that is the kind of up-front, coordinated effort for which project managers strive. It’s an achievement to reach such consensus.

What is the benefit, then, if the recipient is asked to undertake a Title VI review? At best, the project’s schedule becomes highly uncertain, even if EPA decides that such a review is not necessary. At worst, the private parties, eager to get to work, may pull out, responding to a competing offer at a site where a Title VI challenge is unlikely. There’s nothing to stop these challenges because the Guidance allows a request for a Title VI review to come from a complainant anywhere; he or she does not even have to live near a project. Similarly, the Guidance sets no *de minimis* limits, meaning any allegations about any “disparate impacts” all carry the same impact.

Please note: This is not written to deny public review and comment on projects, including those portions or entities requiring an operating permit. But once that process has concluded, and permits are issued, permit holders should not have to face new uncertainties regarding terms and conditions or emission limits, absent significant environmental changes, e.g., a NAAQS violation, or new public health data, or persistent and severe drought. Importantly, these kinds of changes, though, would not target “city sectors.”

The meaning of a permit is to build or operate. If that changes, the permit loses its meaning.

More fundamentally, the type of new development mentioned above, developed cooperatively, implies a project starting in a locale with little or no ongoing, related activity – a “blank slate” kind of site.

In fact, in most older cities and metro regions, economic development and economic projects proceed within a dynamic just the opposite from a “blank slate.” In cities like Cincinnati, many industrial and manufacturing areas have been operating for over a century.

Sometimes, mostly historically, a facility and nearby neighborhoods marched in step. During the last 50 years, though, those links have weakened. People living near a facility may have nothing to do with it, at least regarding employment or providing services. These social shifts include not just individuals, of course, but entire population groups.

Residential change does not occur solely because of business operations. However, a Title VI review implies that permitted facilities will somehow have to keep their operations in tune with social dynamics, which are constant and driven by forces separate from business plans.

For example, one Cincinnati neighborhood has long been home to many people from Appalachia. In the past five years, the same neighborhood drew many new Hispanic residents. For the permitted facilities in or near that neighborhood (proximity is not defined in the Guidance) this population shift, according to the Guidance, seems to present new and different permit conditions. Such revision would be based on the presumption that “disparate impacts” can be detected among human beings from Appalachia or Spanish speaking countries. If the population alters again, would permits again have to change?

The Guidance implies that facility managers need to keep their operations within environmental limits, *plus* keep one eye on social forces. This just does not seem feasible. Granted, EPA writes that it does not foresee a Title VI review focusing on just one permit. Nevertheless, one entire section of the Guidance deals with “challenging permits.” Undoubtedly, permits, the permitting process, and individual facilities and projects will be pulled into an open-ended and adversarial process.

Finally, we have to call attention to new public housing initiatives. In many cities, including Cincinnati, there are initiatives to rebuild inner city neighborhoods. In Cincinnati, some of these new residential areas are close to industrial facilities, and industrial areas, that have operated as such for over a century.

Today, there may be relatively few people near an industrially zoned sector. In 10 years, hopefully those redeveloped neighborhoods will be built out, and full. As permits need to change, though, it doesn’t make sense to level a criticism that more people are now proximate to industrial facilities, and therefore operating permits have to fit into “Area-specific Agreements”, or face reviews that other, more distant permit holders do not have to face. Those new residents arrived because of public policy. The Guidance needs to recognize and separate the very different dynamics of industrial development and urban development.

“Brownfields and Clean-Ups”

In the Part D *Response*, EPA writes that it does not “believe” that the Guidance discourages brownfield development. That belief needs to be described and documented.

This belief might apply for brownfield projects at a site without any current economic activity – a true “dead zone.” There, people would certainly welcome, and could more easily attempt to control, new development.

But it's just as likely that brownfield redevelopment can occur at sites that are part of a vibrant economy. For example, a facility may want to move into an adjacent, but abandoned, parcel characterized as a brownfield. Assuming that related issues can be resolved, the facility may need a permit change – an air permit, perhaps, or a treatment, storage, disposal permit, or a wastewater discharge permit.

If a company takes this step, there are benefits: the company prospers, the local economy expands, land is reused, municipal and school tax bases grow, jobs and related spending may increase. However, if this expansion faces delay because of Title VI reviews, chances are that project managers will think twice about a brownfield site and think again about a far more accessible greenfield site.

These plans, expansions, and private reviews are constant business activities. They need to be energized and encouraged, especially in older industrial sectors where private and public officials struggle to assemble land, make it usable, deal with old and abandoned buildings, and try to correct past practices. The Title VI Guidance will cast a chill over this activity because permits and the permitting process will become a strike point for charges about social inequities and problems.

In its focus on permit challenges, the Guidance raises the popular notion that industrial permits can be reshaped to resolve social problems over which businesses have no direct or indirect control.

Again, consider a business seeking to expand, a business that may have been operating at the same site for 50 years. Whatever the changes off-site, a business still needs a permit and a permitting process that keeps it competitive and that allows it to get products to worldwide customers and markets. Most businesses don't want to ignore the communities in which they operate. Nevertheless, if operating permits are expected to be integrated with unrelated social and community problems, business operations will wither, shut down and move. That's an outcome we think everyone wants to avoid.

Within the *Response* to brownfield concerns, the Guidance raises the possibility of future guidance relating to Title VI and cleanup activities. That guidance should be developed before the Title VI Guidance is finalized.

Thank you for the opportunity to comment on this important issue.

For the Air Quality Committee,

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